

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

ARLENE QUARATIELLO,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil Action No.:1:23-cv-00482-AJ
	)	
TOWN OF RAYMOND, DUDLEY TUCKER	)	
LIBRARY, VALERIE MOORE, trustee of Dudley	)	
Tucker Library, in her individual capacity as trustee	)	
and in her individual capacity, JILL GALUS,	)	
trustee of Dudley Tucker Library, in her	)	
official capacity and in her individual capacity,	)	
SABRINA MALTBY, former trustee of Dudley	)	
Tucker Library, in her individual capacity,	)	
KIRSTEN A. RUNDQUIST CORBETT, director	)	
of the Dudley Tucker Library, in her	)	
official and individual capacities,	)	
	)	
Defendants.	)	
	)	

---

**JOINT MOTION FOR CONSENT ORDER  
AND STIPULATION OF SETTLEMENT**

Plaintiff Arlene Quaratiello and Defendants Town of Raymond, NH, and Dudley Tucker Library, Jill Galus, Sabrina Maltby, Valerie Moore, and Kirsten A. Rundquist Corbett, in their official and individual capacities, respectfully move for entry of the attached Consent Order and stipulate to resolve the above-captioned matter, brought under the First and Fourteenth Amendments to the U.S. Constitution and the right to Freedom of Speech contained in the New Hampshire Constitution, by entry of the attached Consent Order.

All parties consent to this Stipulation and Motion and have executed this document to memorialize their consent. The parties likewise expressly affirm their consent to the Court's entry of the attached Consent Order as a resolution of this matter.

1. The Parties do hereby agree to settle and compromise each and every claim of any kind, whether known or unknown, arising directly or indirectly from the acts or omissions that gave rise to this civil action under the terms and conditions set forth in the attached Consent Order.

2. The attached Consent Order contains the entire agreement between the Parties hereto and supersedes all previous agreements, whether written or oral, relating to the subject matter hereof. No promise or inducement has been made except as set forth herein, and no representation or understanding, whether written or oral, that is not expressly set forth herein shall be enforced or otherwise given any force or effect in connection herewith.

3. The persons signing this Stipulation and Motion warrant and represent that they possess full authority to bind the persons on whose behalf they are signing to the terms contained herein and in Consent Order.

4. The filing of this Stipulation and Motion with the Court shall, upon entry of the attached Consent Order, effect a dismissal of this action with prejudice with each party to pay their own costs and fees.

Respectfully submitted,

**COUNSEL FOR PLAINTIFF**

CLEVELAND, WATERS AND BASS, P.A.

Date: 5/29/2024

/s/ Jacob M. Rhodes  
Jacob M. Rhodes, Esq. (NH Bar #274590)  
Cleveland, Waters and Bass, P.A.  
Two Capital Plaza, Fifth Floor  
Concord, NH 03301  
(603) 224-7761  
[rhodesj@cwbp.com](mailto:rhodesj@cwbp.com)

AMERICAN CENTER FOR LAW & JUSTICE

Date: 5/29/2024

GEOFFREY SURTEES\* (KY Bar No. 89063)  
OLIVIA SUMMERS\* (VA Bar No. 86919)  
/s/ Nathan J. Moelker  
NATHAN MOELKER\* (VA Bar No. 98313)  
BENJAMIN P. SISNEY\* (DC Bar No. 1044721)  
201 Maryland Avenue, NE  
Washington, D.C. 20002  
Telephone: (202) 546-8890  
Facsimile: (202) 546-9309  
Email: [gsurtees@aclj.org](mailto:gsurtees@aclj.org)  
[osummers@aclj.org](mailto:osummers@aclj.org)  
[nmoelker@aclj.org](mailto:nmoelker@aclj.org)  
[bsisney@aclj.org](mailto:bsisney@aclj.org)

\* Admitted pro hac vice.

**COUNSEL FOR DEFENDANTS:**

DUDLEY TUCKER LIBRARY, VALERIE  
MOORE, JILL GALUS, SABRINA MALTBY,  
And KIRSTEN A. RUNDQUIST CORBETT,  
By their attorneys,  
JACKSON LEWIS P.C.,

Date: 5/29/2024

By: /s/ K. Joshua Scott  
K. Joshua Scott, NH Bar No. 17479  
100 International Drive, Suite 363  
Portsmouth, NH 03801  
[joshua.scott@jacksonlewis.com](mailto:joshua.scott@jacksonlewis.com)  
(603) 559-2711 | Direct

Town of Raymond

by their Attorneys,  
FRIEDMAN FEENEY, PLLC

Date: 5/29/2024

By: /s/ Dona Feeney  
Dona Feeney, Esq. (NH Bar No. 12854)  
95 North State Street, Suite 5  
Concord, NH 03301  
[dfeeney@friedmanfeeney.com](mailto:dfeeney@friedmanfeeney.com)  
(603) 783-5105